

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| In re                 | : | Case No. 23-11868-AMC |
| <b>CRISTIANO ZUIN</b> | : |                       |
|                       | : | Chapter 13            |
| Debtor(s).            | : |                       |
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**DEBTOR’S MOTION TO REIMPOSE THE AUTOMATIC STAY**

Cristiano Zuin ("**Debtor**"), hereby moves this Court ("**Motion**") pursuant to § 362(a) of the Bankruptcy Code for entry of an order imposing the automatic stay as to all creditors. In support of this Motion, the Debtor respectfully represents the following:

1. Debtor previously filed two prior Chapter 13 petitions which were dismissed in the last twelve months:
  - Case Number 22-10773-AMC filed on March 29, 2022, and dismissed on June 28, 2022.
  - Case Number 22-12860-AMC filed on October 25, 2022, and dismissed on February 21, 2023.
2. Debtor owns certain real property located at 59 Crooked Billet Road, Hatboro, PA 19040 (the "**Real Property**") which is encumbered by a mortgage lien held by Rocket Mortgage, LLC ("**Creditor**").
3. The Real Property is currently scheduled to be sold at a Sheriff’s Sale on June 28, 2023.
4. The Debtor’s prior bankruptcy cases were dismissed after the Debtor failed to make required Chapter 13 Plan payments. At the time, the Debtor’s employment income was destabilized on account of a serious medical illness affecting his spouse, and her condition continues to require extensive and costly round the clock care.
5. The Debtor is now in the process of applying for a loan modification with Creditor and seeks to prevent the Real Property from being sold in foreclosure during the pendency of the modification application. If the Debtor’s application is denied, the Debtor will promptly list the Real Property for sale under the terms of the Debtor’s Chapter 13 Plan. During the pendency of

this Chapter 13 case, the Debtor will make contractual post-petition mortgage payments to Creditor directly.

6. Based on the foregoing, Debtor respectfully requests that the Court grant the relief requested herein.

WHEREFORE, for the reasons set forth herein, Debtor respectfully requests that this Court enter an order, substantially in the form attached hereto, imposing the automatic stay under §362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2), or a motion for relief is granted under § 362(d).

Respectfully submitted,

YOUNG, MARR & ASSOCIATES

/s/ Paul H. Young  
PAUL H. YOUNG, ESQUIRE  
Attorney for Debtor  
3554 Hulmeville Road, Suite 102  
Bensalem, PA 19020  
P: 215-639-5297  
F: 215-639-1344  
support@ymalaw.com